

# EXHIBIT 1

- TARIQ SHAUKAT -

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK  
----- X  
ULKU ROWE,

Plaintiff,

Case No.  
19 Civ. 08655 (LGS) (GWG)

v.

GOOGLE LLC

Defendant.

----- X  
DATE: October 15, 2020

TIME: 9:34 a.m.

VIDEOTAPED VIDEOCONFERENCE DEPOSITION  
OF TARIQ SHAUKAT, held via Zoom, pursuant to  
Notice, before Hope Menaker, a Shorthand Reporter  
and Notary Public of the State of New York.

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2 internal communications team that wrote them and I  
3 sent them after reviewing them.

4 Q. Was this consistent with your  
5 understanding of his background?

6 A. Generally speaking, yes.

7 Q. Okay, you can put that aside.

8 How did it come to be that Ms. Rowe  
9 was moved into your organization?

10 A. So there were always -- since the  
11 hiring, which as I mentioned was unexpected for me  
12 of these vertical specific people in OCTO, there  
13 was always -- or there -- there was a level of  
14 conflict and misalignment that -- that existed and  
15 kept getting called to light by either customers  
16 or by our teams, and in my role that would be the  
17 sales and go-to-market teams; and so there was an  
18 ongoing discussion that existed for quite a while.  
19 I don't recall the exact length of time, but  
20 almost from the -- the earliest days of these  
21 industry-specific people being in OCTO about the  
22 conflict, how do we resolve the conflict.

23 Will, Brian, and I tried a number of  
24 different avenues to try and resolve the conflicts  
25 that existed and at some point in late 2017 after

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2 the reorganization I mentioned with me taking over  
3 the industry teams, we decided -- "we" being Diane  
4 Greene, myself and Brian -- to move the  
5 vertical-specific OCTO people into the vertical  
6 teams so that we were building. And so that was  
7 the decision that we made, again, late '17/early  
8 '18 and it then took a little while for us to work  
9 out the details and -- and figure out how to do  
10 it, what the roles were, et cetera.

11 Q. And so with respect to the OCTO  
12 vertical folks, was the agreement that if  
13 they -- they would move over into your  
14 organization?

15 A. That was the agreement that I had  
16 with Brian Stevens and Diane Greene, yes.

17 Q. And that they could either have a  
18 team to lead or they could continue in a -- in a  
19 tech advisor-type role --

20 MR. GAGE: Objection.

21 Q. -- correct.

22 A. That is not correct. The idea was  
23 that they would move into a role that we were  
24 calling the Global Client Technical Lead Role and  
25 that they would build out a team there to do that.

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2 That was the design intent that Brian and I had,  
3 and that the job description would be roughly or  
4 almost identical to the job description that they  
5 had had in OCTO, but now aligned with the vertical  
6 teams under the direction of the vertical lead.

7 Q. Okay, and with respect to the team  
8 aspect of it, it was also not planned that they  
9 continue in an individual contributor role,  
10 correct?

11 MR. GAGE: Objection.

12 A. I don't recall. I don't recall that  
13 being the case. In fact, the design intent,  
14 again, was that they were to build out a team  
15 underneath them to really build this capability;  
16 so I don't believe there was that option at the  
17 dis -- at the time that we executed the reorg.

18 Q. The intent was that they would  
19 eventually report into the vertical lead, correct?

20 MR. GAGE: Objection.

21 A. The intention was that they would  
22 report into the vertical lead most likely as a  
23 direct report, but only most likely.

24 Q. At the time they moved over, you  
25 weren't considering any of those four leads for